

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 1:22-mj-02806-Louis

FILED BY FBS D.C.

May 12, 2022

ANGELA E. NOBLE
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S. D. OF FLA. - Miami

UNITED STATES OF AMERICA

vs.

ALAN LI, a/k/a "Michael Chen,"
Defendant.

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? **No**
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)? **No**

Respectfully submitted,

JUAN ANTONIO GONZALEZ
UNITED STATES ATTORNEY

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UNITED STATES DISTRICT COURT

for the
Southern District of Florida

United States of America

v.

ALAN LI,
a/k/a "Michael Chen,"

Defendant(s)

Case No. 1:22-mj-02806-Louis

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 12, 2022 - May 10, 2022 in the county of Miami-Dade in the
Southern District of Florida, the defendant(s) violated:

Code Section
18 U.S.C. § 1594(a)
18 U.S.C. § 2422(b)

Offense Description
Attempted Sex Trafficking of a Minor
Attempted Coercion or Enticement of a Minor

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

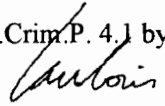
☒ Continued on the attached sheet.


Complainant's signature

Kimberly Jennette, FBI Special Agent
Printed name and title

Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by Face Time

Date: May 12 2022


Judge's signature

City and state: Miami, Florida

Hon. Lauren F. Louis, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT & ARREST

I, Kimberly Jennette, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I have been a Special Agent with the Federal Bureau of Investigation ("FBI") since March 2018. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7). That is, I am an officer of the United States empowered by law to conduct investigations of, and make arrests for, violations of federal law, including the offenses enumerated in Title 18, United States Code, Sections 1591, 2422, 2423, 2251, and 2252.

2. I currently serve as part of the Crimes Against Children group and the FBI Child Exploitation Task Force in the FBI's Miami Field Office. My duties include investigating crimes involving the sexual exploitation of minors, including sex trafficking, child pornography, and enticement violations. I have received training on the proper investigative techniques for these violations, including the use of surveillance techniques, undercover activities, and the application and execution of arrest and search warrants. I have conducted and assisted in several child exploitation investigations. I have also executed search warrants that have led to seizures of child pornography and undercover operations to recover juvenile victims of sex trafficking.

3. I submit this Affidavit in support of a criminal complaint charging ALAN LI, a/k/a "Michael Chen" ("LI"), a 26-year-old Asian male with date of birth July 7, 1995, a social security number ending in 5248, who currently resides at 600 15th Street, Apt. 6, Miami Beach, Florida 33139, with the following offenses: (1) Attempted Sex Trafficking of a Minor Less Than 14 Years of Age, in violation of Title 18, United States Code, Section 1594(a); and (2) Attempted Coercion and Enticement of a Minor, in violation of Title 18, United States Code, Section 2422(b).

4. The facts and information in this Affidavit come from my own personal observations, my training and experience, and information obtained from other law enforcement personnel, investigators, witnesses, and documents. This Affidavit does not include every fact and circumstance known to me, but only the facts and circumstances sufficient to establish probable cause.

PROBABLE CAUSE

5. On or about March 12, 2022, the FBI received a National Hotline Tip from a female in Columbus, Ohio. The complainant ("S.M.") stated an acquaintance, LI, had reached out via Snapchat and asked her to help his friend MICHAEL CHEN ("CHEN") find young girls in the Miami, FL area. The following is a portion of Snapchat conversations between LI, username @alanli771995, and S.M. that occurred on or about March 12, 2022, provided by S.M.:

LI	You said you were trafficked right?
LI	My friend wants to meet young girls and he is willing to pay, can you help him out?
S.M.	Well, put him in touch with [m]e here on Snapchat.
...	
LI	Ok lemme see if he has Snap
LI	One sec
LI	Ok I had him make an account
LI	He's gonna add you
LI	His name is Michael btw

7. Later that day, S.M. received messages from CHEN, utilizing Snapchat username Mikey_chen124. A portion of those conversations are below:

CHEN	Hi I'm mike, alan gave me your contact
...	
CHEN	But I also like younger girls
CHEN	If you know what I mean
S.M.	What age
CHEN	Ideally 8-15
...	
S.M.	Do you have some pictures of yourself? Do you also have any experience with this before?

CHEN	Would prefer to not send pics of myself yet
CHEN	And have some experience with this before yes

8. S.M. stated she had met LI approximately a year ago in Columbus, Ohio through a dating/escort site. The two got together for a night and spoke about her having been trafficked when she was a minor. S.M. and LI lost contact for about a year until he reached out online on or about March 12, 2022. S.M. identified LI as ALAN LI, and told law enforcement that she knew, through social media, LI was working at Mount Sinai Hospital in Miami Beach. S.M. said she and LI followed each other on Instagram. S.M. told law enforcement she believed LI and CHEN were the same person based on the nature of the conversations, LI acting as an intermediary, and the short amount of time between LI's request and CHEN's first message. After further investigation, S.M. reviewed the photo of LI from the website of Mount Sinai Medical Center in Miami Beach, FL. S.M. confirmed that the LI in the photo from Mount Sinai's website is the same LI that she has met and communicated with via Snapchat.

9. Additionally, on March 16, 2022, law enforcement learned that S.M. had also contacted Mount Sinai to report the conversations that she had with LI. J.P., Director of Security for Mount Sinai Medical Center, contacted the FBI to report his conversation with S.M. J.P. provided LI's information, which was recorded as: Alan Li, DOB: 7/7/1995, telephone number 614-537-6514, residential address 600 15th Street, Miami Beach, FL 33139. J.P. also provided LI's Instagram username as alan_li1995. The next week, J.P. also gave law enforcement a copy of LI's personnel file, which included his schedule, network activity on Mount Sinai's computers, and a personal email address of alanli_oh7@yahoo.com.

10. On March 22, 2022, S.M. consented to allow an FBI Online Covert Employee ("OCE") to take over her Snapchat account "PrivateSavvy2.0" to continue talking to CHEN and LI. When the OCE opened S.M.'s Snapchat account on March 22, 2022, Snapchat data showed

CHEN had not reached out to S.M. in four days, but LI had made contact asking for updates on or about March 21, 2022. On March 22, 2022, the OCE messaged LI via S.M.'s Snapchat and provided LI with a "trafficker's" telephone number. The "trafficker," the same OCE utilizing another telephone number, received a text message from LI shortly thereafter. LI used a telephone number, 305-239-8165, whose registered provider is Bandwidth, Inc. ("Bandwidth"), a telecommunications company. Portions of the conversation are below:

LI	I heard you can set me up with some girls?
OCE	Perhaps. What exactly you looking for?
LI	10-14 in the Miami area
OCE	[S.M.] said this was for your buddy?
OCE	Mike?
LI	Yessir
OCE	I'll speak with him directly then if he's interested. I don't mess with middlemen

11. Within a few minutes, CHEN initiated contact with the OCE via another Bandwidth registered telephone number, 786-408-6520:

CHEN	What do you have available?
OCE	Girl or boy?
CHEN	Girl
OCE	Got a 9, 12, and 15 depending on what kind of service you want
CHEN	Full service bareback available?
OCE	For the 9 and 12. Gotta wrap up for the 15
OCE	No anal with the 9
CHEN	Ok let's do the 12
CHEN	So what do I need to do in order to make this happen?

12. CHEN and the OCE then discussed payment and rates. CHEN asked to spend "1 hour" with the 12-year-old girl. The OCE told CHEN he would need to pay half up front and that it would be "\$500 total for bareback sex with 12-year-old. Down payment of \$250 . . ." to be paid through CashApp. As they discussed payment, CHEN asked if he could pay with cash or Bitcoin.

CHEN explained CashApp would not allow him to send money without providing his social security number. He asked if he could have someone else pay for him, and the OCE said they would work it out later:

OCE	. . . we will figure something out [regarding payment]. What kind of long term set up you looking for?
CHEN	Ok no problem
CHEN	And like a live in situation
OCE	You ever had that?
CHEN	Ya once before
CHEN	Do you do that?
OCE	Yes but I keep that very private. What was your previous setup?
CHEN	I just had her live with me and I provided everything
OCE	Fuck her?
CHEN	Of course
OCE	How old was that one? This 12 I got will do anything but had her a while now
CHEN	13
. . .	
OCE Who's kid was it?
CHEN	Just someone I knew in Ohio who set it up for me

13. The OCE and CHEN then discussed the possibility of CHEN purchasing a minor to live with him. CHEN asked whether he should pay in monthly payments or a lump sum. The OCE then asked CHEN how he would keep the 12-year-old "quiet and unseen":

CHEN	Ya she will stay in the house
OCE	And not get out while your gone
CHEN	Ya I mean I'll keep everything locked up but she is well behaved I assume?
OCE	Under my control she is
CHEN	Gotcha
CHEN	Well I'll make sure everything is safe
OCE	How?
CHEN	I keep my place pretty safe and locked up
. . .	
CHEN	And what's your monthly rate?

OCE	I've only ever sold one girl for permanent use and that was a one time payment. Once I sell her she may yours so idk if I want monthly payments linking me to you
CHEN	Gotcha
CHEN	How much did you sell for?
OCE	\$20K
CHEN	Ok that's reasonable. Just need to see the girl first obviously lol

FOLLOW-UP INVESTIGATION

14. On March 23, 2022, law enforcement served a subpoena on Bandwidth for the subscriber information associated with telephone numbers 305-239-8165 and 786-408-6520, as used by LI and CHEN in the above conversations. Bandwidth's records showed both telephone numbers belong to Ad Hoc Labs, Inc (dba Burner). Burner, a mobile app, advertises itself as a "simple and effective way to get extra phone numbers for [a user's] phone, keeping their primary phone number private." Burner says you can "[c]reate as many simultaneous local numbers as you need, in any U.S. or Canadian area code."

15. Law enforcement subpoenaed Snapchat for records associated with the accounts of LI (username @alanli771995) and CHEN (username @Mikey_chen124). Snapchat returns showed CHEN's account was created from IP address 207.244.181.239 ("IP ADDRESS") on March 12, 2022, the same date LI reached out to S.M. about finding young girls. The Snapchat returns also showed CHEN's account was created with telephone number 305-239-8165, the same telephone number LI used to contact the OCE.

16. On March 30, 2022, law enforcement found a Telegram Mobile account with display name "Michael Chen," which was associated with LI's known telephone number, 614-537-6514.

17. Additionally, IP activity showed that, on several occasions, alanli771995 logged out of Snapchat and within a few seconds Mikey_chen124 logged into Snapchat or vice versa from

the same IP address. For example, Mikey_chen124 logged out of Snapchat, on March 12, 2022, at 22:26:21 UTC, and alanli771995 logged into Snapchat at 22:26:25 UTC, both from the IP ADDRESS.

18. On April 4, 2022, CHEN texted the OCE using a new Bandwidth telephone number 305-239-8515:

CHEN	Ok I'll get the cash app sent to you
CHEN	Can you send the receiving address again?
OCE	Mike?
CHEN	Ya what's up
CHEN	Sorry I had to get a new burner phone my old one ran out lol

19. During the conversation, the OCE and CHEN again discussed payment for the 12-year-old girl that CHEN had requested previously. The OCE provided a CashApp ID.

20. On April 7, 2022, the OCE told CHEN that due to the CashApp issues, they could just meet in person. A portion of the conversation is below:

OCE	Hey man, if the cashapp is going to be a huge issue. We can just meet and talk first to make sure your cool. You've been vouched for so I'm not super worried
CHEN	Ya I'm having a hard time figuring it out
CHEN	And ya I'm down to just meet up
OCE	Aight. We are in Atlanta but should be back late Sunday night. Once she gets some sleep and maintenance should be good for Monday or Tuesday
CHEN	Cool I'm down for that
...	
OCE	She should be available for you after the weekend. Can do an hour and go from there. What you into so I can prep her
CHEN	I just want to go raw with cum inside
OCE	Aight that's easy. Nothing rough. No scars or bruises. Obvious but have to say it
CHEN	Yup that's not a problem I'm not rough like that
OCE	Cool. We are going to come back there Sunday night. I gotta pick a spot to work next week. What's close to you?
CHEN	I'm near south beach

21. In the same conversation, CHEN asked the OCE about how their meeting would work and where the OCE was based:

CHEN	Where do you usually do this out of?
CHEN	Hotel!
CHEN	?
...	
CHEN	You're based in Miami tho?
OCE	Yea Miami / Ft Laudy but mostly Miami. Come up to Atlanta a lot to
CHEN	Perfect
CHEN	Excited to meet up

22. CHEN scheduled to meet the OCE and the 12-year-old girl on April 12. But on the evening of April 12, CHEN cancelled, saying he had to work late.¹ CHEN asked, "Can we schedule for tomorrow? It just works so much better for my schedule."

23. The following day, April 13, 2022, LI—not CHEN—reached back out to S.M. via Snapchat. At this point, the OCE had relinquished control of S.M.'s Snapchat account. When S.M. replied on April 16, LI asked about the trafficker she had put him in touch with:

LI	Was mainly wondering about this dude you recommended for me and my friend Michael in SoFL
LI	He's trustworthy right?
...	
LI	... I'm not trying to be sketch but I'm trying to be careful since I don't know him.
S.M.	I get it
LI	So I should hit him up then?

24. From on or about April 16, 2022, to April 28, 2022, CHEN and the OCE did not communicate. On April 29, 2022, CHEN and the OCE resumed messaging when the OCE told CHEN, "Got some high-end girls in town working the beach this weekend and next for F1. If you

¹ During this time, law enforcement were surveilling LI who had already left work that day.

know any players send them my way.” From on or about April 29, 2022, through May 1, 2022, CHEN and the OCE messaged intermittently, texting about what girls were available, what ages, and pricing.

25. On May 2, 2022, CHEN asked the OCE if any girls were available:

CHEN	Anyone available tonight?
OCE	12and 15 rn
CHEN	Any pics? Ans where you at?
	...
OCE	You seen the 12 I'll get you 15 in a min
CHEN	Ok nice, lemme know

26. After CHEN and the OCE discussed the rates for the 15-year-old girl, CHEN messaged, “Ya let’s do it.” He told the OCE he would let him know when he was on his way. The OCE told CHEN, “You waste my time again we are done. I have a business to run.”

27. After the OCE sent that text to CHEN, LI² sent S.M. a message on Snapchat. By this point, S.M. had returned control of her Snapchat account back to the OCE, who pretending to be S.M., stated the following:

LI	I’m worried about this dude T you recommended haha
S.M.	What about him and why?
LI	Idk haha he just gets super aggressive sometimes
S.M.	Why what happened now?
LI	Nothing haha just was gonna meet him tonight and got spooked

28. Based on my investigation, there is probable cause to believe that LI and CHEN are the same person, engaged in the attempted sex trafficking of a minor and the attempted coercion and enticement of a minor, for the following reasons: CHEN’s Snapchat account was created from

² The OCE (when pretending to be the trafficker) has not received any further messages from a person identifying himself as “Alan” since on or about March 23, 2022. Alan LI, however, has continued to communicate with both S.M. and the OCE pretending to be S.M.

the same phone number that LI used to contact the OCE trafficker; IP activity shows that several times alanli771995 logged out of Snapchat and, within a few seconds, Mikey_chen124 logged into Snapchat or vice versa from the same IP address, including the IP ADDRESS registered to LI's known residence; LI's known telephone number, 614-537-6514, is associated with CHEN's Telegram Mobile account; LI initiated contact with the OCE trafficker and said, "I heard you can set *me* up with some girls?" (emphasis added) and only referenced CHEN when prompted by the OCE; LI's work as a middleman for CHEN; the overlap in their biographical information, including that they both previously lived in Ohio and now live near South Beach; and LI's reaching out to S.M. via Snapchat on at least two separate occasions to inquire about the trustworthiness of the OCE trafficker whose information she provided following meetings CHEN, not LI, had scheduled with the OCE trafficker.

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CONCLUSION

29. Based on the foregoing, your Affiant respectfully submits that there is probable cause to believe that, beginning on or about March 12, 2022, ALAN LI a/k/a "Michael Chen" engaged in the attempted sex trafficking of a minor, in violation of Title 18, United States Code, Section 1594(a), and the attempted coercion and enticement of a minor, in violation of Title 18, United States Code, Section 2422(b).

FURTHER YOUR AFFIANT SAYETH NAUGHT


KIMBERLY JENNETTE, SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION

Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1
by Face Time this 12 day of May 2022, in Miami, Florida.


HONORABLE LAUREN F. LOUIS
UNITED STATES MAGISTRATE JUDGE